

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND**

ROBERT CHINN,

Plaintiff,

v.

THEIA GROUP, INC.,

Defendant.

C.A. No. 21-cv-00378-MSM

**NOTICE OF EXTENSION OF RECEIVERSHIP STAY THROUGH JANUARY 31, 2023**

**PLEASE TAKE NOTICE** that on November 8, 2021, the Southern District of New York (the “Receivership Court”) entered an *Order Appointing Michael Fuqua as Receiver* (Doc. No. 117) (the “Receivership Order”) in the case styled *FCR Advisors, LLC v. Theia Group, Inc., d/b/a “Thorian Group” and/or “Cypherian”; Theia Aviation, LLC; and Theia Holdings A, Inc., d/b/a “Thorian Holdings,”* C.A. No. 1:21-cv-6995 (PKC) (the “Receivership Case”). A true and correct copy of the Receivership Order is attached as **Exhibit A** and is incorporated herein by reference.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Receivership Order, the Receivership Court stayed (the “Receivership Stay”) any “action, proceeding, lawsuit or bankruptcy case against the Receivership Entities<sup>1</sup> or impacting the property and assets subject to this [Receivership] Order, including an action, proceeding or lawsuit heretofore commenced, without having first obtained leave of” the Receivership Court, for a period of 120 days following entry of the Receivership Order. Receivership Order, at ¶ 4. In addition, “[n]o person or entity, including any creditor or claimant against any of the Receivership Entities, or any person acting

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<sup>1</sup> The term “Receivership Entities” is defined the Receivership Order as, collectively, Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc. *See* Receivership Order, at ¶ 1.

on behalf of such creditor or claimant, shall take any action to interfere with the taking control, possession, or management of the assets" of the Receivership Entities. *Id.*, at ¶ 5.

**PLEASE TAKE FURTHER NOTICE** that, on December 9, 2022, the Receivership Court entered an *Order* (Doc. No. 312) (the "Stay Extension Order") in the Receivership Case, pursuant to which the Receivership Court further extended the Receivership Stay through and including January 31, 2023. A true and correct copy of the Stay Extension Order is attached as **Exhibit B** and is incorporated herein by reference.

**PLEASE TAKE FURTHER NOTICE** that one or more of the Receivership Entities is a named defendant in the above-captioned action. Accordingly, the Receiver respectfully submits that this action has been stayed by the Receivership Order and the Stay Extension Order until at least **January 31, 2023** (pending further order of the Receivership Court).

Dated: December 22, 2022

REED SMITH LLP

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*Counsel for Michael Fuqua, in his capacity as Receiver of Theia Group, Inc., Theia Aviation LLC, and Theia Holdings A, Inc.*